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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF MOLLY JENNINGS  
IN SUPPORT OF DEFENDANT'S  
MEMORANDUM IN OPPOSITION TO  
USER PLAINTIFFS' MOTION TO  
EXCLUDE PORTIONS OF TESTIMONY  
OF DR. CATHERINE TUCKER**

Judge: Hon. James Donato

1 I, MOLLY JENNINGS, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I  
3 represent Meta Platforms, Inc. in the above-captioned action. I submit this declaration in support  
4 of Meta's Memorandum in Opposition to User Plaintiffs' Motion to Exclude Portions of  
5 Testimony of Dr. Catherine Tucker.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of the Declaration of  
7 Dr. Nicholas Economides in Support of Consumer Plaintiffs' Motion for Class Certification  
8 Errata served on July 27, 2023 ("Economides Rep.").

9 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the transcript  
10 from Nicholas Economides's deposition held on September 14, 2023 ("Economides Dep. Tr.").

11 4. Attached hereto as Exhibit 3 is a true and correct copy of the User Class Rebuttal  
12 Report of Catherine Tucker served on August 4, 2023 ("Tucker Rep.").

13 5. Attached hereto as Exhibit 4 is a true and correct copy of the Reply Declaration of  
14 Professor Nicholas Economides in Support of Consumer Plaintiffs' Motion for Class  
15 Certification served on September 1, 2023 ("Economides Reply Rep.").

16 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the transcript  
17 from Catherine Tucker's deposition held on September 7, 2023 ("Tucker Dep. Tr.").

18 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the transcript  
19 from Joseph Farrell's deposition held on September 22, 2023 ("Farrell Dep. Tr.").

20 8. Attached hereto as Exhibit 7 is a true and correct copy of an article by Sagee Ben-  
21 Zedeff titled *Introducing Study From Facebook*, dated June 11, 2019 and available at  
22 <https://about.fb.com/news/2019/06/study-from-facebook/>.

23 I declare that the foregoing is true and correct under penalty of perjury.

24 Executed on this 13th day of October, 2023, in Washington, DC.

25 By: /s/ Molly M. Jennings  
26 Molly M. Jennings  
27  
28

**SIGNATURE ATTESTATION**

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from the signatories.

By: /s/ Sonal N. Mehta  
Sonal N. Mehta